



# NORLITE CORPORATION

---

628 SO. SARATOGA STREET  
PO BOX 684  
COHOES, NY 12047  
PHONE: (518) 235-0401  
FAX: (518) 235-0233

September 19, 2012

Karen M. Gaidasz, CPESC  
Environmental Analyst  
New York State Department of Environmental Conservation  
Region 4  
1130 North Westcott Road  
Schenectady, NY 12306-2014

RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng  
Air Compliance Branch  
United States Environmental Protection Agency  
Region 2  
290 Broadway  
New York, NY 10007-1866

RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedance Report  
Kiln 1: 08/29/12- 09/17/12  
Kiln 2: 08/29/12- 09/17/12

Dear Sirs:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite Corporation (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 08/29/12 thru 09/17/12. The attached document explains each of the "malfunctions" for Kiln One and Two.

The results of the investigation concluded a majority of the exceedances were a result of the 1 second time delay cutoff limit of -0.00 inches of water column associated with the negative backend chamber pressure. The majority of the cutoffs were found to be caused by controlling LGF Flow with valves and having high LGF Line pressure. The high LGF line pressure made finite control with the valve very difficult. Most of the cutoffs were results of a pressure pulse in the kiln system which was a result of a sudden LGF fuel surge caused by minute valve changes. Norlite attempted to reduce the overall LGF Line pressure to improve the LGF handling effectiveness.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically. Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: [tvancouver@norlitecorp.com](mailto:tvancouver@norlitecorp.com).

Sincerely,

*Thomas Van Vranken*

Thomas Van Vranken  
Environmental Manager  
Attachments

ecc: Don Spencer, NYDEC – R4 w/attachments  
James Lansing, NYSDEC – CO w/attachments  
Joe Hadersbeck, NYSDEC – R4w/attachments  
Tita LaGrimas, Tradebe w/attachments

DCL: 2410



NORLITE CORPORATION  
MACT EXCEEDANCE REPORT - KILN 1

08/29/12 - 09/17/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
9/1/2012	2:14:40	9/1/2012	2:16:01	0:01:21	121	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
9/8/2012	10:34:40	9/8/2012	10:36:38	0:01:58	122	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
9/10/2012	13:10:48	9/10/2012	13:12:35	0:01:47	123	Malfunction	Kiln Operators Were Using Valves to Control Fuel Flow. A Fuel Flow Surge was Experienced Due to High LGF Line Pressure Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for LGF Span	LGF Flow	Span	Adjusted Fuel Flow
9/11/2012	18:29:18	9/11/2012	18:52:31	0:23:13	124	Malfunction	End of Burn Tank Was Reached Which Caused a Pressure Pulse in the Kiln System Due to the Loss of Flame. The Pressure Pulse Affected the Rear Chamber System	Back Chamber Pressure, 1 Second Delay	Opl	Switched Tanks and Reestablished Fuel Flow
9/13/2012	12:42:40	9/13/2012	12:43:47	0:01:07	125	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
9/15/2012	1:15:05	9/15/2012	1:15:33	0:00:28	126	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
9/15/2012	1:16:09	9/15/2012	1:16:42	0:00:33	127	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow



NORLITE CORPORATION  
MACT EXCEEDNACE REPORT - KILN 2  
08/29/12 - 09/17/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
9/1/2012	0:16:31	9/1/2012	0:17:06	0:00:35	316	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
9/1/2012	0:43:15	9/1/2012	0:44:00	0:00:45	317	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
9/4/2012	17:22:21	9/4/2012	17:22:51	0:00:30	318	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
9/6/2012	21:52:00	9/6/2012	21:58:59	0:06:59	319	Malfunction	The Operator Went Off LGF To Stop A Kiln Pressure Cutoff From Occurring. The Sudden Stop of LGF Flow Caused A Pressure Pulse In the Kiln System Which Caused A Rear Chamber Pressure Cutoff	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
9/7/2012	4:13:57	9/7/2012	4:14:17	0:00:20	320	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
9/8/2012	2:51:10	9/8/2012	2:51:58	0:00:48	321	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
9/10/2012	13:11:42	9/10/2012	13:12:02	0:00:20	322	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
9/11/2012	3:55:39	9/11/2012	3:56:56	0:01:17	323	Malfunction	Kiln Operator Was Attempting to Re-establish LGF Fuel Flow After A Tank Switch. The LGF Line Pressure Was High Due to the Tank Switch Which Made Fine Control With A Valve Difficult Which Resulted In A Pressure Pulse In the Kiln System	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow

9/12/2012	2:13:50	9/12/2012	2:14:28	0:00:38	324	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
9/12/2012	16:45:36	9/12/2012	16:49:16	0:03:40	325	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
9/13/2012	0:14:59	9/13/2012	0:15:28	0:00:29	326	Malfunction	Kiln Operator Was Attempting to Re-establish LGF Fuel Flow With A Valve Which Resulted In A Pressure Pulse In the Kiln System	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
9/13/2012	0:52:58	9/13/2012	0:53:41	0:00:43	327	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
9/13/2012	1:06:45	9/13/2012	1:13:52	0:07:07	328	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
9/15/2012	6:18:38	9/15/2012	6:19:17	0:00:39	329	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow